

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

CYWEE GROUP LTD.,)
Plaintiff,)
v.) Civil Action No.
HUAWEI DEVICE CO. LTD.,) 2:17-cv-00495-WCB-RSP
HUAWEI DEVICE (DONGGUAN))
CO. LTD., AND HUAWEI DEVICE)
USA, INC.,)
Defendants.)
)

DECLARATION OF JIA ZENG

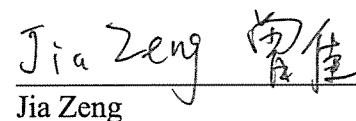
I, Jia Zeng, declare as follows under 28 U.S.C. § 1746:

1. I am an engineer at Hangzhou Huawei Enterprises Telecommunication Technologies Co., Ltd. (“Huawei”). I have personal knowledge of the facts stated below and, if called to do so, I could and would testify as follows.
2. I have worked at Huawei since 2014. Among other things, I am responsible for and oversee implementation of the sensor fusion algorithm in Huawei’s Mate 10, Mate 10 Porsche, and Mate 10 Pro devices.
3. Huawei’s Mate 10, Mate 10 Porsche, and Mate 10 Pro devices use sensor fusion algorithms created by Huawei. These algorithms are not part of the Android Open Source Project, and we did not receive them from Google by other means.
4. I am also familiar with the algorithms implemented by the sensor fusion team in the Huawei’s Honor 8, Mate 9, and MediaPad M2 10.0 devices. In particular, I studied these

algorithms as part of developing the sensor fusion algorithms for the Mate 10, Mate 10 Porsche, and Mate 10 Pro. As with the Mate 10, Mate 10 Porsche, and Mate 10 Pro, the Honor 8, Mate 9, and MediaPad M2 10.0 devices use sensor fusion algorithms created by Huawei, that are not part of the Android Open Source Project, and that we did not receive from Google by other means.

5. Huawei has not and does not share any of these sensor fusion algorithms with anyone at Google.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Hangzhou, China on June 19, 2018.



Jia Zeng